

**IN THE UNITED STATES DISTRICT COURT FOR THE  
WESTERN DISTRICT OF PENNSYLVANIA**

<b>MARGARET MAZUR,</b>	}	
	}	
<b>Plaintiff,</b>	}	<b>No. 2:17-cv-00826-JFC</b>
	}	
<b>vs.</b>	}	<b>Judge Conti</b>
	}	
<b>SOUTHWESTERN VETERANS</b>	}	
<b>CENTER and DEPARTMENT OF</b>	}	
<b>MILITARY AND VETERANS</b>	}	
<b>AFFAIRS,</b>	}	
	}	<i>Electronically Filed</i>
<b>Defendants.</b>	}	<i>February 28, 2018</i>

**MOTION TO COMPEL DISCOVERY**  
**FOR FIRST AND SECOND DISCOVERY REQUEST**

**COMES NOW Plaintiff**, hereafter, Mazur, and submits a Motion to Compel discovery required by Rule 26(a) pursuant to F.R.C.P. Rule 37. Mazur hereby certifies that she has in good faith conferred or attempted to confer with Defendants' Counsel, Mr. Bradley, regarding the failure of complying with discovery requests in an effort to obtain discovery without court action.

Defendants continue to provide non-responsive evasive answers and arbitrarily deciding what is or what is not relevant without explanation as to why they consider a request as not relevant or conferring with Mazur as she requested they do before refusing to answer or provide discovery.

1. All of Mazur's discovery requests have been consistent with the the goal of a just, speedy and inexpensive determination and resolution of litigation disputes.
2. Absent a Motion to Compel proper Discovery, Mazur will be forced to incur significant costs and burden to try and obtain relevant information through depositions.
3. Defendants' counsel has caused undue delays and obstructed Mazur's attempts in obtaining pertinent information to the case. Mazur will need to file a motion to extend discovery time if

Defendants' continue to refuse to cooperate by providing confusing and evasive non-responses to straight-forward discovery requests.

4. Mazur's discovery requests are very proportional and relevant to the needs of this case and would significantly reduce court time if Defendant cooperates. Then the only remaining issues needed to be argued would be actual facts in dispute. The requested discovery is consistent with the underlying goal of allowing a just, speedy and inexpensive resolution of issues at dispute.

WHEREFORE, for the foregoing reasons, Mazur respectfully requests that this Court grant this Motion to Compel.

Respectfully submitted,

/s/ Margaret Mazur, Pro Se (February 28, 2018)

**CERTIFICATE OF SERVICE**

I, Margaret Mazur, certify that a true and correct copy of **PLAINTIFF'S MOTION TO COMPEL DISCOVERY FOR FIRST AND SECOND DISCOVERY REQUEST** was served on March 1, 2018, to the following:

**Electronically served to:**  
**Scott Bradley, Defendants Counsel**  
**sbradley@attorneygeneral.gov**

*/s/ Margaret Mazur (March 1, 2018 )*

**Margaret Mazur, Pro Se**